Jean Paul Lauren
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Plaintiff, representing self

## IN THE UNITED STATES DISTRICT COURT
## FOR THE DISTRICT OF MONTANA
## BUTTE, DIVISION

| | |
|---|---|
| Jean Paul Lauren, | ) |
| | ) Cause No. CV 17-62-BU-BMN-JCL |
| **Plaintiff,** | ) |
| | ) |
| vs. | ) |
| | ) **Amended Complaint** |
| | ) |
| Montana State University | |
| Cruzado            ) | |
| John Paxton | ) |
| Brenda York | ) |
| **Defendants** | ) |

This lawsuit is based on the American Disability Act, Title 42, Chapter 21 of the U.S. Code, Age Discrimination Act of 1975, the Racketeer Influenced and Corrupt Organizations Act (RICO ACT), and Federal Defamation Laws. The primary complaint is the prevention of a disabled older student (and veteran) from continuing a successful PhD program in Computer Science (3.8 GPA on 45 PhD credits).

MSU is being sued under the ADA and the RICO Act. Cruzado, Paxton, and York are being sued under Federal Defamation Laws. Additionally, MSU is being sued for discrimination under Federal Age protection laws and Federal Race protection laws.

Oddly the justification for dismissing this student is the failure to complete three undergraduate prerequisites that he had already taken (a mis-read of his transcript), and the denial or delay of accommodations in order to complete these three classes. Again, very oddly is the justification for these undergrad prerequisite classes being a low GRE analytical score that doesn't relate to these classes at all. (and that the Neurologist said that the GRE would not be predictive of graduate success because of his disabilities) These additional perquisites and threat of additional classes represents intimidation and an attempt to get the student to quit the program.

In fact, shortly after Paxton took over the department as chairman, this student was asked to look into transferring to another doctoral program. (even though this student was demonstrating success in this program)

This lawsuit seeks damages for discrimination for disabilities, age, (possible race as Grandparents lived on the OK Choctaw Reservation), fraud under RICO, defamation, failure to provide ADA accommodations

& access, and other. Under the ADA and RICO acts, MSU shows Fraud and a systematic failure to provide accommodations, support, and other due to the student's disabilities, age, veteran status, or possibly other.

With the 'Independent Forensic Email Discovery Process' broadened under the RICO Act, we may see a pattern that relates to a class action, and we reserve the right to pass this information to the appropriate Federal and State organizations.

The argument in this complaint is simple, a successful PhD student was refused continuance of studies. (was it based on discrimination due to disabilities, age, race, veteran status, or other; was there complicity as an organization either through actions or lack of actions; is there a broader pattern of bad behavior, or other) Most importantly, the dismissal of Plaintiff was done against MSU's own policies with apparent blessing of management (Fraud under the RICO Act). The Plaintiff was on a 'Medical Leave of Absence' when MSU dismissed him from a successful PhD program.

Bottom line, it seems very odd that a successful student would be disallowed from continuing studies.


DATED this 21st day of May 2018

Respectively submitted,

Jean Paul Lauren

Please reference the original 'Complaint' and previous 'Amended Complaint' for further detail and history.

Plaintiff has proposed a simple framework for a possible negotiated settlement in the previous amended complaint. (please refer to for greater detail) But in general, Plaintiff asks for:
- A monetary settlement (now increased under the RICO)
- Readmission to the PhD program (two remaining computer science classes, use EE dept as primary dissertation advisor, research assistanceship)
- Fix the MSU ADA access issues like the pool lift, parking, Administrative Building access, and other.

Plaintiff is open to discussing a mediated settlement from the Court.